

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

IN RE: KENNETH ALLEN PENDERGRASS,	{	CHAPTER 13
	{	
	{	
DEBTOR(S)	{	CASE NO. R17-42492-MGD
	{	
	{	JUDGE DIEHL

SUPPLEMENTAL OBJECTION TO CONFIRMATION

COMES NOW MARY IDA TOWNSON, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Chapter 13 petition fails to include a debt owed to National Title Pawn of Dalton - Walnut, in violation of Bankruptcy Rule 1007(a)(1) and 11 U.S.C. Section 1325(a)(3).

2. The proposed plan fails to provide for the treatment of National Title Pawn of Dalton - Walnut. However, said creditor has filed a secured claim.

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of this Debtor's (s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

February 7, 2018

_____/s/_____
K. Edward Safir, Attorney
for Chapter 13 Trustee
GA Bar No. 622149

Mary Ida Townson, Chapter 13 Trustee
Suite 2200 - 191 Peachtree Street, N.E.
Atlanta, GA 30303-1740
(404) 525-1110
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R17-42492-MGD

CERTIFICATE OF SERVICE

This is to certify that I have this day served

DEBTOR(S):

KENNETH ALLEN PENDERGRASS
1807 MALONE DRIVE
DALTON, GA 30720-5649

ATTORNEY FOR DEBTOR(S):

RICKMAN & ASSOCIATES, PC
SUITE 200
1755 NORTH BROWN ROAD
LAWRENCEVILLE, GA 30043

in the foregoing matter with a copy of this pleading by
depositing in the United States Mail a copy of same in a
properly addressed envelope with adequate postage thereon.

This 7th day of February 2018

/s/

K. Edward Safir, Attorney
for Chapter 13 Trustee
GA Bar No. 622149

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